

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

BRETT HECKMANN

Plaintiff,

v.

C.A. No. 1:19-cv-00472-JJM-PAS

BRENDAN MCDONALD,
JASON DIGRADO,
GARY MCDOLE AND
CHRISTOPHER KELLY,
Individually and in their official
Capacities as police officers of the
Town of Smithfield, Rhode Island
Defendants.

**DEFENDANTS' CONSENTED-TO MOTION TO
EXTEND ALL OF THE PRE-TRIAL DATES**

Now come the Defendants, and with the consent of the Plaintiff, move for an extension of all pre-trial dates for an additional thirty (30) days. Currently, discovery closes on February 1, 2021. Defendants and Plaintiff request that factual discovery be extended to March 3, 2021, that all other pre-trial dates be extended in conformity with the discovery closure date extension. Defendants and Plaintiff state as reason that, although extensive discovery responses and materials have already been exchanged, and the depositions of the Plaintiff, Defendant Jason DiGrado and Defendant Brendan McDonald have already taken place, the depositions of Defendant Gary McDole and Defendant Christopher Kelly remain outstanding, along with the depositions of three (3) witnesses, which require subpoenas. The process of completing discovery has been slowed down by ongoing discussions to resolve this lawsuit, as well as by health incidents due to covid and a surgery. As such, the additional time is necessary.

WHEREFORE, Defendants and Plaintiff respectfully request that the pre-trial dates be extended an additional thirty (30) days. Specifically, it is requested that factual discovery be

extended to **March 3, 2021**; Plaintiff's expert disclosures due by **April 2, 2021**; Defendants' expert disclosures due by **May 3, 2021**; Expert Discovery to close on **June 3, 2021**; and Dispositive Motions due by **July 2, 2021**.

Defendants,
By their attorneys,

/s/ Marc DeSisto (#2757)

Marc DeSisto, Esq.

Karen K. Corcoran

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CERTIFICATION OF SERVICE

I hereby certify that the within document has been electronically filed with the Court on January 28th, 2021, that it is available for viewing and downloading from the ECF system, and that the counsel of record listed below will receive notice via the ECF system:

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/s/ Karen K. Corcoran